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Attorneys for Defendants  
COUNTY OF SANTA BARBARA and  
SANTA BARBARA COUNTY SHERIFF'S DEPT.

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

JUNAN CHEN, KELLY YAO  
WANG, CHANGSHUANG WANG,  
JINSHUANG LIU, LICHU CHEN,  
and WENQUEI HONG,

Plaintiffs,

v.

COUNTY OF SANTA BARBARA;  
SANTA BARBARA COUNTY  
SHERIFF'S DEPARTMENT; CAPRI  
APARTMENTS AT ISLA VISTS;  
ASSET CAMPUS HOUSING; and  
DOES 1 through 200, Inclusive

Defendants.

Case No: CV 15-1509-JFW (JEMx)

**STIPULATION TO EXTEND  
TIME FOR DEFENDANTS  
COUNTY OF SANTA BARBARA  
AND SANTA BARBARA  
COUNTY SHERIFF'S  
DEPARTMENT TO RESPOND  
TO COMPLAINT (L.R. 8-3)**

Complaint served on: March 12, 2015  
Current response date: April 2, 2015  
Proposed response date: May 4, 2015

Judge: Hon. John F. Walter  
Courtroom: 16 – Spring Street

Plaintiffs JUNAN CHEN, KELLY YAO WANG, CHANGSHUANG  
WANG, JINSHUANG LIU, LICHU CHEN, and WENQUEI HONG and  
Defendants COUNTY OF SANTA BARBARA and SANTA BARBARA  
COUNTY SHERIFF'S DEPARTMENT, by and through their respective  
counsel, submit the following Stipulation pursuant to Local Rule 8-3 (Response  
to Initial Complaint):

STIPULATION TO EXTEND TIME TO RESPOND TO INITIAL COMPLAINT

1 Defendants COUNTY OF SANTA BARBARA and SANTA BARBARA  
 2 COUNTY SHERIFF'S DEPARTMENT seek a 30-day extension to answer or  
 3 otherwise respond to Plaintiffs' Complaint for Damages. Plaintiffs stipulate to  
 4 this extension. With the Court's approval, these defendants' response will be  
 5 due on or before May 4, 2015.

6 COURT'S STANDING ORDER

7 The parties are aware that under the Court's Standing Order, no  
 8 stipulation to extend time is effective until the Court's approval. This  
 9 information is provided per the Standing Order:

- 10 (a) The existing due date is April 2, 2015. No additional dates have yet  
 11 been set by the Court;
- 12 (b) The new date proposed by the parties is May 4, 2015.
- 13 (c) The reason for the requested extension, which is provided for by  
 14 Local Rule 8-3, is that these defendants intend to file a Motion to  
 15 Dismiss under Federal Rule of Civil Procedure 12(b)(6). Due to the  
 16 nature of the issues and counsels' current caseloads, County Counsel  
 17 requires additional time to prepare a quality motion.
- 18 (d) There have been no prior requests for an extension by any parties.

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STIPULATION

IT IS HEREBY STIPULATED AND AGREED, pending Court approval, that the COUNTY OF SANTA BARBARA and SANTA BARBARA COUNTY SHERIFF'S DEPARTMENT may have until May 4, 2015, to file a response to the Complaint for Damages.

Dated: March 17, 2015    MICHAEL C. GHIZZONI  
COUNTY COUNSEL

By: /s/  
Lisa A. Rothstein  
Senior Deputy County Counsel  
Attorneys for Defendant  
COUNTY OF SANTA BARBARA and SANTA  
BARBARA COUNTY SHERIFF'S DEPARTMENT

Dated: March 17, 2015    McNICHOLAS & McNICHOLAS, LLP

By: /s/  
Patrick McNicholas  
Attorneys for Plaintiffs  
JUNAN CHEN, KELLY YAO WANG,  
CHANGSHUANG WANG, JINSHUANG LIU,  
LICHU CHEN, and WENQUEI HONG

**DECLARATION OF SERVICE BY MAIL**

I am a citizen of the United States and a resident of Santa Barbara County.  
I am over the age of eighteen years and not a party to the within entitled action;  
my business address is 105 East Anapamu Street, Suite 201, Santa Barbara, CA.

On March 18, 2015, I served a true copy of the within **STIPULATION  
TO EXTEND TIME FOR DEFENDANTS COUNTY OF SANTA  
BARBARA AND SANTA BARBARA COUNTY SHERIFF'S  
DEPRATMENT TO RESPOND TO COMPLAINT (L.R. 8-3)** on the  
interested parties in this action by:

☒ electronic transmission via CM/ECF to the persons indicated below:

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☒ (Federal) I declare that I am employed in the office of a member of  
the Bar of this Court at whose direction the service was made.

Executed on March 18, 2015, at Santa Barbara, California.

/s/

Sue Collisson